

EXHIBIT G

Scales v. [Your HOA] (2019)

United States District Court, Nevada | Decided March 5, 2019

SUMMARY OF CASE: In *Scales v. HOA*, a federal court found that a homeowner's association (HOA) violated the Fair Housing Act by refusing a disabled homeowner's request to allow her service dog in the HOA's common areas. After denying the accommodation, the HOA escalated by harassing the homeowner, levying fines, and threatening her with legal action.

KEY FACTS:

- Plaintiff was a disabled homeowner who relied on a service dog for daily function.
 - The HOA denied access to common areas and refused to accommodate her disability.
 - The HOA proceeded to fine and harass the homeowner for continued use of her service dog.
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COURT HOLDING:

- The HOA's denial of accommodation and subsequent conduct violated the FHA.
 - The jury awarded the plaintiff **over \$635,000** in compensatory and punitive damages, including attorney fees.
 - The court emphasized that HOA boards cannot ignore federal disability law and must respond to accommodation requests with **individualized consideration** and in **good faith**.
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RELEVANCE TO PLAINTIFF'S CASE: This case serves as a mirror precedent to the conduct of Brookside Park Condominium. As in *Scales*, Plaintiff Lester Lee requested reasonable accommodations related to his service dogs and was instead met with retaliatory acts including:

- Harassment,
- Surveillance,
- Fines or punitive conditions,
- Denial of services and amenities,

- Intentional emotional distress.

This conduct was not procedural; it was intentional, retaliatory, and unlawful.

LEGAL SIGNIFICANCE: This Exhibit supports Plaintiff's claims that Defendants have committed actionable violations under the FHA and ADA and that their behavior warrants sanctions and judicial scrutiny.

This Exhibit supports Plaintiff's assertion that Defendants misrepresented precedent and acted in bad faith to deflect from valid disability discrimination claims.

Submitted in Support of:

Plaintiff's Motion to Strike Discovery Responses, Motion for Sanctions, and Motion to Disqualify Counsel.